

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|  |   |                            |
|--|---|----------------------------|
| INTERNATIONAL BUSINESS MACHINES CORPORATION, | ) |                            |
|  | ) |                            |
| Plaintiff,                                   | ) | C.A. No. 16-122-LPS        |
|  | ) |                            |
| v.   | ) | <b>JURY TRIAL DEMANDED</b> |
|  | ) |                            |
| GROUPON, INC.                                | ) |                            |
|  | ) |                            |
| Defendant.                                   | ) |                            |

**IBM’S MOTION FOR ENHANCED DAMAGES, ATTORNEYS’ FEES,  
PRE- AND POST-JUDGMENT INTEREST, AND AN ONGOING ROYALTY**

Pursuant to Fed. R. Civ. P. 54, 59, and any other applicable rule, Plaintiff International Business Machines Corporation (“IBM”) respectfully moves for an award of enhanced damages, attorneys’ fees, pre- and post-judgment interest, and an ongoing royalty. The grounds for this motion are set forth in IBM’s Opening Brief, submitted herewith.

Respectfully submitted,  
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